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Air Quality Action Plan consultation

Dear David Gribben,

Trustees from the City of Durham Trust took part in the Air Quality event hosted on 23 November 2023 in Durham Town Hall, and sent further comments on 7 December in the hope that this might help shape the new AQAP. It is disappointing that no new action points have resulted from the consultation.

As stated in our December letter, the Trust's main points are:

- more measures placing additional costs on users of polluting vehicles must be included so that the polluter pays
- given the climate emergency, the ranking and prioritisation of actions should also reflect the likely impact on carbon emissions
- any actions to “investigate” or “study” possible interventions should rapidly be developed into firm proposals
- measures which tackle air quality but which are also visible to the public will help with awareness of the issues and potentially build public support

The AQAP does not state what the targets for air quality improvements are, nor over what timescales it is hoped they will be achieved. The targets and timescales should be clearly set out. Each year the Council should consider whether the plan is on track, and reallocate resources accordingly. The introduction states that the air quality has been “relatively stable for several years”. The Council must ensure that the next major AQAP reports a significant improvement in air quality instead.

Thank you for sharing the scores behind the ranking methodology outlined in Appendix H. It is useful to see the assessment of the impact of each intervention. Aside from the enlargement of the Park and Ride, the two measures identified as most effective are the screening of planning applications for air quality issues, and the use of planning conditions to implement Policy 21 on sustainable transport. The Trust fears that this is over-optimistic without recognition from the Planning Authority of the weight that needs to be given to environmental issues.

A very recent example is the application to rebuild the Prince Bishop's shopping centre. Active Travel England responded to the application with major concerns about the quantity and

inaccessibility of the cycle parking, the need for contributions towards cycle route improvements, and failings in the proposed Travel Plan. The Trust had made similar objections, also pointing out that the cycle parking, as designed, was impossible to operate. The applicant has partially justified the quantity of cycle parking (but only in respect of the proposed student accommodation) but made no other changes. No internal consultees addressed these issues: there was no response from Sustainable Transport and the Travel Plan officer simply requested a condition rather than assessing the applicant's framework plan. The planning officer's report appears to use the Travel Plan's modest cycling targets to justify the poor cycling facilities, has not recognised the possible solutions to the accessibility issues, and has weighed the issues as "limited negative harm". The report recommends approval of the application.

This case is not unusual. It shows how the planning assessment has not upheld AQAP Action 3, Action 9 or Action 20. There was no assessment of the car parking aspects of the application (which could have supported Action 6). Of the actions in the AQAP judged to have a benefit score of 2 or higher, none have been advanced through this planning application.

In order to achieve change, a concerted and co-ordinated effort is needed across the council. Further review and assessment is not a plan for action, which needs policies for achieving real and measurable improvement. The need to work with the climate change team to develop measures that tackle both air quality and greenhouse gas emissions has already been mentioned. The importance of these issues needs to be fully recognised by the Planning Authority and supported and argued for by members of the Council. The Trust would be very willing to meet with officers and members to help develop ideas further.

The Trust is concerned that Table 31 in Appendix F holds in reserve the idea of ring roads or relief roads for the city, to be considered as part of the County Durham Plan review. The Council needs to move on from the environmentally-damaging relief road proposals, and implement the many sustainable transport measures in the Durham City Sustainable Transport Delivery Plan (DCSTDP). Our detailed comments are set out in response to the survey questions below.

Yours sincerely,

John Lowe,
Chair, City of Durham Trust

Survey questions

About the Park and Ride

Action 1: Increase the parking capacity of Durham City park and ride sites to help incentivise the use of the park and ride service across the city. A stretch action will be to investigate the feasibility of new sites on routes where there is currently no provision.

Action 5: Engage further with park and ride operators to introduce zero emission buses on park and ride routes and implement funding opportunities through liaison with Transport North East.

Action 7: Investigate extending the existing number of days and/or hours of operation of all park and ride sites.

Action 11: Identify opportunities to install complimentary additional services to the park and ride service across the city centre and development sites, such as cycle storage, micro mobility, bicycles and e-bikes plus improved services at park and ride sites such as parcel pick-up and delivery and extending EV (electric vehicle) charging facilities.

Q1. Do you have any concerns about any of the actions in the park and ride section of the air quality action plan?

> **Action 1:** The plan does not present any information regarding the current capacity and usage of the Durham City Park and Ride sites. Is there evidence that capacity is the main issue discouraging use of the Park and Ride? Clearly if capacity is an issue, then it is important to increase the capacity, perhaps by introducing additional sites as well, but other incentives should be explored.
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> There are some major employment sites which the Park and Ride does not serve very well, or may only serve in a limited way from one of the Park and Ride car parks. For example, the main university campus at Mountjoy is not readily accessible from the Sniperley or Belmont P+R services. Employers at the Belmont and Abbey Road industrial estates are also not well served, and some traffic passing through the AQMA will be people driving to these. If the Park and Ride bus fare could act as a day ticket accepted by all operators, this would enhance the appeal of the Park and Ride. It may require smart ticketing or contactless payment to avoid abuse through people transferring paper tickets.
>
> Increasing the uptake of the Park and Ride can be supported by other actions such as Action 6 on parking policy and pricing strategy.
>
> **Action 5:** The Trust supports this action. Table 11 states that achieving this action would be subject to contractual agreement and mentions the October 2024 renewal of the contracts. If contracting for the use of electric buses turns out to be more expensive than diesel buses, will the Council be able to accept such a contract and cross-subsidise by increasing on-off-street car parking charges and potentially residential permits? Considering the frequency of the P+R services operating through the AQMA, it is very important to reduce the emissions to zero.
>
> **Action 11:** The Trust is doubtful that complementary services such as micro-mobility, bicycles and e-bikes would have much impact while the cycle network in the city centre remains so poor. See further comments under Action 20.

Q2. What do you feel will be the overall impact upon you and/or your business of the park and ride section of the air quality action plan?

Positive.

Improving the Park and Ride should encourage economic activity in the city centre, and if electric buses are introduced this will very much help to improve the air quality.

About parking

Action 6: Use parking policy and a revised pricing strategy for council-owned car parks and council on-street parking to assist in tackling traffic congestion within Durham City by encouraging modal shift to cleaner, more sustainable travel modes. In addition, investigate the introduction of other policies such as emission-based car parking charges, to further encourage modal shift.

Q3. Do you have any concerns about the action in the parking section of the air quality action plan?

Action 6 is the only action in the whole plan which might involve the people who cause the pollution (the drivers of vehicles) actually being charged for causing that pollution. The action to be taken, however, is not clearly defined. It is unclear whether it encompasses on-street residential parking permits, and what changes to management and pricing are envisaged.

Section 3.2 of the AQAP refers to the Parking and Accessibility SPD 2023, and states that it “seeks to limit private car parking at destinations where there is frequent public transport and/or where an area is covered by a Local Cycling and Walking Infrastructure Plan”. In fact, the SPD contains tables stipulating the recommended quantity of car parking in a uniform manner across the county. Within accessible locations such as Durham City, paragraphs 2.10 and 2.18 allow officers discretion to limit parking case by case, but there is no guidance in the SPD as to the levels that would be acceptable.

Section 3.2 of the AQAP also mentions the preparation of a new Car Parking Policy document, to be agreed during 2024. It states “if plans are approved there will be an increase in on and off-street parking”. Is this perhaps a mistake – is the word “charges” missing at the end of the sentence?

The Trust considers that a comprehensive Car Parking Policy for the city is much needed. This should be linked to objectives not only to improve air quality, but also to achieve modal shift and promote sustainable transport in support of Climate Emergency Response Plan 2. The policy framework should include parking under the council's direct control (council-operated car parks, on-street parking for residents and visitors) and also the use of the planning system to set expectations for workplace travel plans and management of car parking at destinations within the city. A good example of a parking strategy covering all these aspects is that produced for Bath and North East Somerset Council in 2017. See https://beta.bathnes.gov.uk/document-and-policy-library/balancing-your-needs-parking-strategy-bnes

The Durham City Sustainable Transport Delivery Plan 2019-2035 makes several references to car parking policy, for example in sections 2.2.9, 3.1.4 and 5.3.3. In relation to commuting, it notes that “one of the principal challenges in managing the demand for car travel is the abundance of (often free) parking at major employers within the city” and that “the choice of travelling by car is made easy by this freely available car parking,

even when high quality alternatives are available". It concludes that increasing the price of workplace car parking and reducing its use must be considered alongside other measures.

There are two means that the Council could use to tackle free car parking at employment sites. The most direct, which would achieve the fastest results, would be the imposition of a Workplace Parking Levy. Nottingham City Council is still the only authority to have introduced such a charge, but others are beginning to explore this option. The charging structure and the area to which it applies can be determined by the council. Employers can choose to absorb the charge or pass all or part of it on to its employees. As well as providing an incentive for employers to reduce their car parking provision and promote sustainable transport, the income stream could be very useful to the authority. Nottingham has used it not just to help finance the tram network, but also to purchase the largest fleet of electric buses in Europe.

Given the many other actions in the AQAP to "investigate" or "review", the Trust thinks it would be appropriate to investigate and potentially develop proposals for a Workplace Parking Levy for Durham City. Appendix G rejects this action on the grounds that "Council owned car parks could provide a viable alternative". There are a number of public car parks in Nottingham, both council-owned and privately operated, but this did not make the WPL there infeasible. The Council could avoid employees using Council-owned car parks (and on-street parking) by restricting the duration of stays. There is a strong argument for better management of car parking to reduce the amount cars have to circulate while finding a free space. Nottingham has won a number of industry awards for its management of parking and congestion, and the idea should not be summarily dismissed.

The only other means of influencing employer car parking is via the planning system. This is addressed in the comments under Action 9.

The Trust considers that the Council should move much more rapidly on emissions-based charging. Table 8 in section 5.1 mentions "significant local opposition" to variable charges based on emissions of vehicles and adds "in reality, this needs to happen". The Trust takes the view that it is important to establish the "polluter pays" principle. There is understandable concern that charges which favour electric vehicle users will hit hardest those who are less affluent and unable to afford to replace their vehicles, particularly householders with no access to off-street parking. This is mentioned in section C.2 on p.94. The Trust suggests that this difficulty could be overcome by phasing in the charging differentials for residential permits over a number of years. Any car not previously registered for a permit would be subject to the new charging regime immediately, providing a strong incentive for householders to choose smaller and less-polluting vehicles when they replace. Over the course of five years, say, the charging for previously-registered vehicles could gradually be brought into alignment, giving people an incentive to replace or give up more polluting cars and a clear timescale to allow them to plan and budget.

Alternatives to car ownership, such as public transport and car clubs, will also need to be improved so that giving up a car can be a positive experience rather than a hardship. This will support the CERP2 vision for 2045 (p. 14) of a future with less individual car ownership. See also the response to Q6 below.

The Trust would not wish to see free permits for electric vehicles, and suggests that no permits should be cheaper than the present rate. There should also be higher charges for

larger, heavier vehicles, such as SUVs, even if they are electric. These are disproportionately implicated in collisions with vulnerable road users, and their popularity is negating fuel efficiency gains and driving up emissions. Discouraging their use through higher charges would make the street safer for the cleanest means of travel.

Many councils are now using emissions-based charges for residential permits and for parking in car parks or on street. For example, Islington's annual permit charges are based on engine or battery size, or carbon emissions: https://www.islington.gov.uk/parking/parking-permits/parking-permit-costs-table

Bath & North East Somerset Council applies emissions-based charges in car parks: https://beta.bathnes.gov.uk/emission-based-car-parking-charges

Section C.2 of the AQAP provides further analysis on car parking. The number of parking permits in Durham City, however, comes from a report which dates from 2013/14.

Q4. What do you feel will be the impact upon you or your business of the parking section of the air quality action plan?

Positive.

If carefully implemented, car parking measures to encourage modal shift and better manage the existing spaces could reduce congestion and make it easier to find parking spaces, thereby improving the accessibility and attractiveness of the city centre. But the balance of these measures will need to be correct: if managed badly, changes could dissuade people from using the city centre without having any impact on congestion.

About electric vehicles

Action 4: Encourage the uptake of electric vehicles (EVs) across the county by supporting the provision of EV charging including fast and rapid charging and EV filling stations where this is appropriate.

Action 12: Implementation of a scheme to offer the use of EV vans on a free trial for 2 to 3 weeks to small and medium enterprises to promote the uptake of electric vehicles.

Q5. Do you have any concerns about any of the actions in the electric vehicle section of the air quality action plan?

Action 4: The Trust is supportive of the provision of additional EV charging, but notes that Table 11 promises that objectives and specific measures will be defined within six months. Currently this action leaves a lot unspecified. The impact of this action on air quality will depend very much on the details of implementation.

Is there good evidence to support the Council being more involved in EV charging provision, or will the impact be insignificant compared with national policy levers such as phasing out sales of fossil fuel cars and vehicle excise duty incentives?

To benefit air quality, this action needs to focus on helping local people who have no regular access to other charging facilities, rather than, for example, enabling recharging on long journeys. There is overlap with Action 12 here: vans used by some types of business are often parked overnight at an employee's house, and to reduce the use of diesel vans charging facilities may be required.

The Council's Climate Emergency Response Plan 2 (p.14) envisages a future where individual car ownership is less common. In order to reduce the carbon impact of replacing fossil fuel cars directly with an equivalent number of battery electric cars, the Council should be promoting shared ownership through car clubs and alternative low-carbon transport options including e-bikes as options that can reduce car ownership.

One of our Trustees has a EV and lives in a terraced house. He is a participant in a Council trial of “Kerbo” which is a pavement channel with a self-closing lid, so the charging cable fits in this and doesn't trip anybody up. The charger is fitted to the wall of the house. He is very pleased with it. It is apparently at the evaluation stage, and the results should be incorporated in any future revision of the Air Quality Action Plan. Although currently householders have no right to claim a particular on-street parking space, this has not so far proved to be a problem in practice. It would be prudent to designate spaces adjacent to chargers like this as short-term parking only (say up to four hours), with exceptions for the householder and anybody actually plugged in to the charger (to allow for visitors with an EV). This would be a safeguard against somebody parking and going on holiday.

Action 12: There is a clear need to help businesses switch to electric vans. The data dashboard cited in Table 11 under Action 4 shows that currently there are only 87 battery electric vans in County Durham. Carbon emissions from vans are still rising. Issues include a lack of variety in the van models on sale, and problems of charging commercial vehicles. Vans are often parked overnight at employees' houses, but may be excluded from locations such as car parks where public chargers have been installed.

The information in section C.9 suggests that this action has already begun. It reports on a trial using four electric vans over the course of a year. Where it states that “it was assumed that all four vans would … cover 17,500 miles per day” it presumably should read “per year”.

Utilisation of the vans was low, as they were used for less than half the working days in the year. There is no information on whether any of the 50 businesses which borrowed the vans went on to purchase electric vans, or why they did not complete the trials. The Council presumably has survey data from the businesses which will show the barriers to uptake and allow further actions to be developed.

If uptake rates of the trial vehicles do not improve, perhaps the Council could arrange for them also to be available to car club members through Co Wheels, when they are not being borrowed for three-week trials by businesses?

The scheme could be expanded to cover trials of electric delivery bicycles and similar equipment, which can be even more effective in reducing emissions. Considering the vans used in the trials averaged only 18 miles per day, full-size vans may not be necessary for a lot of the business activities. If this idea is pursued, then rather than tying up capital by purchasing examples of different types of bicycle delivery vehicles, perhaps the Council should make arrangements with a private sector firm to cover the costs of a try-before-you-buy service.

Q6. What do you feel will be the impact upon you or your business of the electric vehicle section of the air quality action plan?

Positive.

Encouragement of the uptake of electric vans (or other electric delivery vehicles) should help to cut diesel emissions and improve air quality. It may also reduce costs for businesses. Adoption of electric vehicles more generally should reduce the various harmful combustion products in the AQMA, but may not have much impact on particulates from tyres which are estimated to make up half of the microplastics entering rivers and 80% of air-borne microplastics. Brake dust may be reduced because of regenerative braking. The size and weight of electric SUVs erases some of the gains from moving to electric vehicles.

Measures which therefore encourage people to replace fossil fuel vehicles with smaller electric vehicles or e-cargo bikes, or to use shared-ownership electric vehicles via car clubs will have a far greater impact on greenhouse gas emissions and air quality. Speed of transition is of the essence in the climate emergency.

About buses, taxis and light goods vehicles

Action 8: Work with bus operators to track the emissions classification of buses on routes of specific areas of concern, to inform which buses should be operating within the AQMA to provide cleaner exhaust emissions.

Stretch action to identify and implement, where appropriate, any funding streams for retrofitting buses, purchasing hybrids and/or alternatives where they may have the greatest benefits for air quality within Durham.

Action 14: Improve journey quality offer for users at public transport hubs and Durham City Bus Station with improved vehicles, priority arrangements to further encourage modal shift alongside improved real time passenger information.

Action 15: Improve environmental facilities in the bus station including green wall/water harvesting and photovoltaics.

Action 16: Review the licensed vehicle taxi fleet operating in Durham. Subject to the outcome of this review, an update of the previous taxi emission study on the Durham taxi fleet may be required.

Action 19: Obtain a better understanding of the freight and delivery fleet operating in Durham, potentially followed by a feasibility study for the introduction of a freight micro-consolidation scheme to serve Durham City to improve air quality from the shipping of goods into and out of the city.

Action 21: Investigate intelligent transport systems in more detail including SCOOT improvements and funding opportunities west of Durham City Centre and implement bus priority measures on the major bus corridors.

Q7. Do you have any concerns about any of the actions in the buses, taxis and light goods vehicles section of the air quality action plan?

Action 8: This action seems to focus on understanding the types of buses currently in use and their emissions. The Trust supports the need to obtain better information about this significant source of air pollution, but this needs to be translated swiftly into actual mitigation actions.

Other compact university cities like Cambridge and Oxford have sizeable electric bus fleets. Why can this not be achieved in Durham? Nottingham City Council's funding

model has allowed it to acquire the largest electric bus fleet in Europe. (See response to Action 6.)

Action 14: The information in Table 11 is very unclear for this action. It suggests that the expected completion date would be 2023, but also that there is "no progress to date". There are relatively few bus priority arrangements in Durham City at present, and more should be done to help make buses more attractive.

Action 15: While this may help with air quality in the bus station, this action would appear to have negligible impact on air quality in the wider AQMA. From the wording in Table 11 it would seem that what has been funded is producing a report on the installation and maintenance of the facilities.

Action 16: From the description in section C.8 this action seems to consist of working out the types of taxi operating in the city by comparison with 2019, and then potentially seeking an update to the AECOM estimates of emissions from the taxi fleet. No measures to respond to the last emissions study or to the potential study are proposed. It is clear that taxis and private hire vehicles, like all other cars, have to be switched to zero emission vehicles in order to meet climate change commitments. Instead of further delay the Council should devise actions to hasten that transition, which will bring air quality benefits as a side-effect.

Action 19: Like actions 8 and 16, this seems to be primarily information gathering. It is regrettable that these studies were not carried out earlier so that the AQAP could include more actual mitigations.

Action 21: The Trust supports more bus priority measures. Any further SCOOT improvements must not increase the attractiveness of car travel or increase the capacity for motor traffic. As recognised in CERP2, we need a considerable reduction in car use, not just a switch to electric vehicles, to meet climate change commitments. Any benefits to motor traffic flow must therefore be coupled with measures such as road space reallocation to enhance bus priority and to provide protected space for cycling and walking.

Q8. What do you feel will be the impact upon you or your business of the buses, taxis and light goods vehicles section of the air quality action plan?

Neither positive nor negative.

These actions will have no immediate impact. This is disappointing because buses, light goods, and heavy goods vehicles are significant contributors to poor air quality.

About new developments

Action 2: Screen any proposed development in accordance with the latest up to date guidance on air quality. Support any development with air quality and traffic assessments that take into consideration cumulative development, where screening identifies there may be a significant adverse effect on air quality.

Action 3: Impose conditions that comply with the provision of Policy 21 (Delivering Sustainable Transport) of the County Durham Plan.

Q9. Do you have any concerns about any of the actions in the new developments section of the air quality action plan?

Action 2: The wording of this action is unclear. If there will be a significant adverse effect on air quality, then a development should not be supported just because it includes air quality and traffic assessments. Surely there should also be sufficient mitigation for any predicted impacts?

Action 3: The Trust is supportive of using planning policy to the full in order to achieve sustainable development. Planning decisions and conditions depend on the weight accorded to policies and the planning balance. The Trust considers that planning officers have not been giving sufficient weight to air quality and climate change when evaluating transport assessments and impacts. They are not helped by the Highways internal consultees, who do not generally take sustainable transport into account in their responses. The Trust would like to see all relevant officers taking responsibility for delivering sustainable transport and commenting on planning applications in the light of CERP2 and the AQAP, and taking the opportunity to further adopted strategies and delivery plans including the Durham City Sustainable Transport Delivery Plan, the Strategic Cycling and Walking Delivery Plan and the Local Cycling and Walking Infrastructure Plans.

The result of the Examination in Public of the County Plan showed that planning inspectors take sustainable transport seriously. The wider environmental impacts of development are increasingly coming to the fore in decision-making, as evidenced by the recent Supreme Court ruling regarding oil drilling in Surrey.

Q10. What do you feel will be the impact upon you or your business of the new developments section of the air quality action plan?

Positive.

The application of the planning policies that promote sustainable transport should lead to better-designed developments and infrastructure that enables better health, wellbeing and productivity.

About green environment

Action 18: Review the work previously undertaken in relation to green infrastructure within the AQMA, and where practicable implement the recommendations made.

Action 20: Implement the Strategic Cycling and Walking Delivery Plan 2019-2029

Q11. Do you have any concerns about any of the actions in the green environment section of the air quality action plan?

Action 18: Table 11 estimates that the review would be completed within 12 months of adopting the new AQAP. This is similar to the many other actions to investigate or review other actions.

Action 20: The fact that cycling and walking figures so low in the ranking is disappointing. Although the ranking method is described in Appendix H, no actual scores have been given, so it is hard to understand whether this is justified. The ranking method fails to take into account whether a measure will also help achieve other council objectives, such as targets relating to health and to greenhouse gas emissions. If a holistic view of policy objectives were taken, this action might have been ranked significantly higher.

Although there have been a number of cycling schemes funded in the last two years, there is yet little infrastructure that would enable people to switch to cycling for journeys in the AQMA. Most funding has been obtained for routes on the periphery of the city. This is despite the fact that the primary route for investment in the Durham City LCWIP (South Road, Church Street, New Elvet, Baths Bridge, Gilesgate, Sunderland Road) includes much of the AQMA. The Council should concentrate on providing a joined up cycle network which actually reaches key city centre destinations. To improve the walking and cycling network, the Council should investigate restricting car access to certain rat-runs and secondary through routes. This could be achieved with modest expenditure and also improve bus priority.

The analysis of potential benefits in section C.7 may have some flaws. The DfT report cited (Ref 23) is concerned with what percentage of additional cycling trips generated by new or improved infrastructure would have transferred from car. The figure is reckoned to be 25%. The analysis in C.7 equates this with the potential for modal shift on a given route. This is not the same quantity: it is completely unrelated. The Council could use the DfT's Propensity to Cycle Tool, www.pct.bike, to estimate the impact. This sophisticated model estimates modal shift, taking into account factors such as the quality of infrastructure and the hilliness of the terrain. This can give estimates for each Middle or Lower Super Output Area of the number of cycle commuters resulting from improved infrastructure and the number of drivers who would switch to cycling. This would be a better approach to estimate the impact on air quality of the Strategic Cycling and Walking Delivery Plan.

Q12. What do you feel will be the impact upon you or your business of the green environment section of the air quality action plan?

Positive.

Better green infrastrcuture together with walking and cycling routes will not only improve air quality but also will help tackle climate change, and improve health and wellbeing.

About raising awareness

Action 9: Work with major employers in Durham City and assist with the development, implementation and enforcement of workplace travel plans including reporting, evidencing uptake and regular review.

Action 10: Develop web pages and other forms of social marketing to increase awareness of air quality issues and promote behavioural change.

Action 13: Define and implement a public awareness campaign focusing on air quality.

Action 17: Use variable message signs (VMS) to provide information regarding air quality.

Q13. Do you have any concerns about any of the actions in the raising awareness section of the air quality action plan?

Action 9: Travel Plans have had a mixed record in Durham: over the years monitoring has been quite variable and securing Travel Plans via conditions has not allowed public debate of the objectives. For example, Durham Johnston School was required to put a Travel Plan in place when the new building was approved about 15 years ago, but it has not been updated since and no travel survey figures are available from the school. New

College Durham was obliged to put in place a Travel Plan by planning conditions in 2022, but one year later a further application was approved increasing the car parking spaces without any reference as to how much progress the college had made towards the travel plan goals. In planning applications from Durham University we have seen claims that no additional traffic will result because no car parking is being provided, only for a separate application for car park construction to be approved. There is never any assessment of the total car parking capacity across the university's estate.

If the Council is to obtain greater influence over the provision of free car parking at employment sites, identified as a key issue in the DCSTDP, this needs to be given far more attention by specialist officers with access to high quality data. All travel plans agreed through planning conditions and the periodic travel survey results should be made available to the public. Often, it appears, officers agree with developers a pessimistic approach to travel mode in order to provide a robust (i.e. worst case) analysis of highways impacts, and this is carried over into the initial Travel Plan. Assessments often use TRICS data, which may come from parts of the country with completely different car ownership levels. Instead, targets for modal shift should be informed by local data, such as census travel to work share, and be set in line with UK carbon emissions reductions targets. Durham University's current Travel Plan is a good example of how to set scientifically-reasoned targets. Modal shift for new sites should be front-loaded in Travel Plans, as the best time to get people to change travel habits is when they move into a new house or start accessing a new destination.

The analysis of potential impact in section C.6 is confusing. The reference to a table is not complete, but we presume this is Table 22 on p. 92. It is true that Table 22 indicates that 5% of the available parking provision is long-stay. The analysis then goes on to argue that if each employee using a long-stay parking space shared a journey once a week, this would amount to a 0.5% reduction in total journeys to the city. This is flawed, because it assumes that there are no employer-provided car parking spaces, yet the quantity is significant. Besides, many of the long-stay parking spaces are at the Park and Ride. A fifth of them are at the railway station and probably do not relate to employment in Durham at all.

Actions 10, 13 and 17: There may be some behavioural change resulting from promotional activities such as these, but more importantly raising awareness of the issues of poor air quality should make it easier to persuade the public to accept some of the more divisive measures which need to be implemented if the Council is to achieve behavioural change on a wider basis.

Q14. What do you feel will be the impact upon you or your business of the raising awareness section of the air quality action plan?

Positive.

Stronger travel planning should help to cut down on unnecessary car journeys and improve air quality.

About any additional actions

Q15. Do you have any additional suggestions for actions in the future?

Student cars

The numbers and use of student cars within the city is an issue which is raised periodically by residents. Student car use has certainly increased over time, and if this trend continued it would be unsustainable. How much of a contribution to air quality issues can be attributed to student cars is debatable: there is a marked increase in car use during the university terms (as there is during school terms, of course) which adds to congestion and affects bus service reliability. If the Council concentrates on a general reduction in traffic, then it is important that any measures which free up road capacity do not simply allow more growth in student car use, for example. The different factors at play need to be recognised.

It is very evident to residents that many students bring cars to Durham. Some are used little, and block the use of parking spaces by others. Others are used regularly, often to travel quite short distances, e.g. from the Viaduct area to Mountjoy or to travel to the Maiden Castle sports centre.

The University already has strict criteria for determining whether a student may obtain a permit for using University car parks: permission is limited largely to those with mobility impairments and those training as teachers who may require a car to travel to teaching practice. A growing proportion of UK students reduce their costs by applying to local universities and living at home while studying. Some of these may travel to Durham University by car, but at present the University would not allow them to have permits, and so that demand has to be met via on-street car parking. Some students see the car as a means for accessing part-time employment. Female students may feel safer using a car at night rather than walking.

The University cannot prevent students applying for residential permits or using public parking. Student travel surveys show about 5% of students travel by car, but there is a lack of information on the number of students with access to a car and the reasons behind the car travel. The Council should be able to work out how many permits are issued to houses with a student council tax exemption.

Appendix G notes the suggestion of restricting residential parking permits for students but rejects it on the grounds that it is “difficult and inappropriate to implement a scheme that differentiates student properties from others”. It also notes “cost implications for restricting the eligibility for second permits in student properties”.

Nottingham City Council has been charging students more for parking permits for over a decade, so it is clearly possible to overcome these objections. Parking permits for students cost £100 per year for each of up to three cars per property. Residents are charged nothing for the first car, £35 per year for the second, and £50 for a third. See https://www.nottinghamcity.gov.uk/information-for-residents/transport-parking-and-streets/badges-and-permits/parking-permits/

In terms of “cost implications” it should be possible both to reduce the number of student cars in the city and maintain revenue by setting the charges appropriately. However, arrangements based purely on charging students more than at present may do little to affect use of cars by the affluent minority of students. Could the Council restrict the issuing of permits to student houses on the same criteria that the University use for determining permits for University car parks?

Another approach might be to change how residential permits are allocated. Rather than a quota of two permits per house, there could be a limit on the number of permits for each area of the CPZ, set according to the capacity of the streets. If there were a shortfall compared to demand, applicants would join a waiting list. Students would perhaps be less

likely to apply if there was no immediate prmit available, and might not rise to the top of a waiting list before they move on. Waiting lists are used in some local authorities, for example Brighton and Hove: https://www.brighton-hove.gov.uk/parking/parking-permits/resident-parking-permits/join-waiting-list-resident-parking-permit

Having a limit on the permits for each zone could allow the Council to make reductions over time, allowing reallocation of road space for bus priority lanes, cycle lanes, pavement widening or street trees. If residential permits were more restricted or more expensive, there would have to be means to avoid undesirable side-effects, such as the conversion of front gardens to parking which could harm the character of a street.

Management of car parking

Reducing the use of student cars once they have been brought to Durham may also be possible through better management of on-street car parking in streets near to the University (Church Street, Hallgarth Street, Stockton Road, Quarryheads Lane, Potters Bank). There is certainly a need to do this. The Council encountered strong opposition to proposals to widen pavements in Church Street in 2018, primarily owing to concern from residents at the loss of some parking spaces. Parking to access the dental practice, for social care appointments and for supermarket food deliveries to St Oswald's School have all been cited as issues.

If the Council changed the parking restrictions so that stays were limited to two hours for non-residents, this would improve the availability of spaces for deliveries and accessing businesses, and might also discourage use by students. The Council presumably has data on how long a stay people tend to pay for. It is possible that, with better management of the car parking, inappropriate car use could be discouraged, and the remaining demand could be served with fewer spaces. This would allow some spaces to be repurposed to provide wider pavements or cycle lanes.

The University might need to take more responsibility for accommodating cars in its own car parks by amending its permit criteria, for example, to permit students who live at home to use the car parks if public transport is not a reasonable option. It does not seem right for the University on the one hand to be offering free car parking to all staff, and on the other hand causing an impact on nearby residential streets.

Low traffic neighbourhoods (LTNs)

Although Low Traffic Neighbourhoods have become a political hot potato, a Department for Transport review, published in March 2024, concluded that they are generally effective, that more residents support them than oppose, but that there is often a perception (not borne out by traffic surveys) that they cause congestion on surrounding streets.

Applying these principles to Durham City, the Council could consider the scope for traffic filtering on historic routes which have now been bypassed by modern roads such as the A690, A167 etc. It is still possible to drive the full length of the historic route through Carrville, Gilesgate and Claypath to the city centre. Much of this route is in the AQMA. Despite SCOOT there is considerable congestion on the historic routes through the Gilesgate roundabout at certain times of day. Point closures, bus gates or congestion charging at strategic points in Carrville, on the Sunderland Road and Claypath could divert traffic onto the A690 and simultaneously allow bus services to pass through the main residential areas faster. This would increase the attractiveness of bus services not just for residents of these areas but also for bus travellers from the villages surrounding

Durham. Space would be freed up, relatively cheaply, for cycle routes and walking improvements. Contrary to highway engineer orthodoxy, traffic is not simply displaced: a fair proportion evaporates through people switching modes, retiming their journeys, or combining multiple trips into one.

Front Street, Framwellgate Moor, could also be considered for this type of intervention. In central Durham, Margery Lane / Quarryheads Lane is a route with very high pedestrian traffic during university terms, but appallingly poor provision, with very narrow footways. It is also an important cycling link. It is hard to see how provision for walking and cycling could be improved without reintroducing some form of restriction on motor traffic, as during the New Elvet Bridge works.

School traffic

Ensuring all schools develop Travel Plans would be beneficial. Funding to employ a school travel officer within the Council to assist schools to draw up Travel Plans might be one approach. The Council should also look at “school streets” where appropriate, where traffic restrictions are put in place at school start and end times to improve safety and encourage sustainable travel.

A side benefit would be raising awareness of air quality and the importance of sustainable transport with parents and children, giving the Council a vehicle for promoting and gaining support for other measures in the plan.